



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

via e-mail

March 10, 2017
FPU17-157

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE:WAFB – ADEQ Comments – *Draft Annual 2015 Groundwater Monitoring Report, Former Liquid Fuels Storage Area, Site ST012, Former Williams Air Force Base, Mesa, Arizona*; prepared for Air Force Civil Engineer Center (AFCEC/CIBW), Lackland AFB, TX; prepared by Amec Foster Wheeler Environment & Infrastructure, Inc. (amec), Phoenix, AZ; document dated December 20, 2016.

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the above referenced document. ADEQ's comments are presented below.

Specific Comments

1. Page 4-2, Lines 784-800. Please revise the western plume boundary discussion. Monitoring results between 1995 and 1997 from well ST012-W18, which was abandoned in 1999, showed benzene concentrations ranging from 4,200 µg/L to 7,100 µg/L, indicating impacted groundwater. However, the Draft document states "...prior sample results from UWBZ/CZ and LSZ wells in this area do not indicate this area was impacted by jet fuel releases associated with operations at the former WAFB."
2. Figure 1-3. Please add labels to all of the CZ/UWBZ monitoring wells.
3. Figure 3-7. The map should show the benzene plume extending to wells W11 and W37, despite the fact that groundwater samples were not collected from wells W11 and W37 in November 2015. . LNAPL was known to occur at these locations at that time, and subsequent sampling confirmed the occurrence of benzene concentrations exceeding the remedial goal.

Closure

ADEQ may add or amend comments if evidence to the contrary of our understanding is discovered; if received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was signed; if other parties bring valid and proven concerns to our attention; or site conditions are deemed not protective of human health and the environment within the scope of this Department.

Main Office

1110 W. Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W. Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

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Thank you for the opportunity to comment. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager, Federal Projects Unit
Remedial Projects Section, Waste Programs Division

cc:	Catherine Jerrard, USAF AFCEC/CIBW	catherine.jerrard@us.af.mil
	Carolyn d'Almeida, U.S. EPA	dAlmeida.Carolyn@epamail.epa.gov
	Ardis Dickey, AFCEC/CIBW	ardis.dickey.ctr@us.af.mil
	Steve Willis, UXO Pro, Inc.	steve@uxopro.com
	ADEQ Reading and Project File	